

FREKHTMAN & ASSOCIATES

ATTORNEYS AND COUNSELLORS AT LAW

60 BAY 26th STREET
BROOKLYN, NEW YORK 11214
(718) 331-7700 FAX: (718) 232-7967
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April 3, 2008

Judge Miriam Cedarbaum
United States District Court
Southern District of New York
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: Ahmed v. Siddique, et al. , 2008 CV 1108

Dear Judge Cedarbaum:

Pursuant to your Honor's directive at the initial conference in this matter, plaintiff is submitting a letter which describes all indicia of domicile for defendant Mohammed Siddique. As your Honor may recall, the issue of Siddique's residence is important in deciding whether this action was properly removed to federal court. If Siddique is a resident of Connecticut, then diversity jurisdiction is destroyed since plaintiff Ahmed is also a resident of that State.

The following are indicia of domicile in Connecticut for defendant Mohammed Siddique:

- 1) All address summaries for an Accurint (division of Lexis/Nexis) comprehensive search revealed CT addresses from 1995-2007. Attached is a copy of the report.
- 2) Lien and Judgment from 1999 for Danbury Hospital in CT.
- 3) Work records reveal Siddique had a company M Siddique painting in New Milford, CT.
- 4) Motor Vehicles Registered to Mr. Siddique are a 1984 Oldsmobile registered in CT, 1990 Toyota Camry registered in CT.
- 5) The 2001 Toyota Tundra pickup truck involved in this accident was registered in CT, had CT license plates, and was purchased by Mr. Siddique at Colonial Subaru For in Danbury, CT on 2/2/2005. See Car Fax report attached.
- 6) The police accident report indicates a 125 Railroad St New Milford, CT address for Mr. Siddique which is confirmed by Accurint. Plaintiff and Mr. Siddique were traveling from their homes in CT to NY at the time of the accident.

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- 7) The No Fault adjuster from Progressive Insurance Company which insured the Siddique vehicle involved in this accident sent me a copy of the Declarations Page for Mr. Siddique's insurance policy entitled: Coverage Summary. Attached please find a copy of this document. It shows Mr. Siddique's address in New Milford, CT. and a Danbury, CT Progressive office known as Doyon Ins. Agency was the insurance broker where Mr. Siddique purchased the policy.

All research to date indicates Mr. Siddique was domiciled in Connecticut at the time of this accident. The only evidence to the contrary is a Brooklyn address on the police report under the operator section. The New Milford, CT address was listed for the owner and it is the same individual since the name is the same and the date of birth is identical. The single indication of a Brooklyn address signifies that Mr. Siddique may have kept an apartment in Brooklyn but his domicile was clearly Connecticut where he lived since 1995, for 13 years.

Thank you for your attention.

Sincerely,



Arkady Frekhtman

Important: The Public Records and commercially available data sources used on reports have errors. Data is sometimes entered poorly, processed incorrectly and is generally not free from defect. This system should not be relied upon as definitively accurate. Before relying on any data this system supplies, it should be independently verified. For Secretary of State documents, the following data is for information purposes only and is not an official record. Certified copies may be obtained from that individual state's Department of State.

Comprehensive Report

Comprehensive Report

Date: 01/02/08


Report processed by:

Frekhtman & Associates
2102 Bay Ridge Parkway
Brooklyn, NY 11204-5945
(718) 331-7700 Main Phone
(718) 232-7967 Fax

Report Legend:

 - Shared Address

 - Deceased

 - Probable Current Address

Subject Information

Name: **MOHAMMED A SIDDQUE**
Date of Birth: **02/01/1958**
Age: **49**
SSN: **126-76-xxxx** issued in New York between 01/01/1990 and 12/31/1991

Others Associated with SSN:
(DOES NOT usually indicate any type of fraud or deception)
RAJ MOHAMMED
Age:

AKAs (Names Associated with Subject)

MOHAMMED SIDDIQUE
DOB: **02/01/1958** Age: **49** SSN: **126-76-xxxx**
SIDDIQUE MOHAMMED
DOB: **02/01/1958** Age: **49** SSN:

Indicators

Bankruptcy: **No**
Property: **No**
Corporate Affiliations: **No**

Address Summary

125 RAILROAD ST APT 2, NEW MILFORD CT 06776-2717, LITCHFIELD COUNTY (Sep 1995 - Nov 2007)

Phone at address: **(860) 354-0681** **MOGUMDER ABDUL M**
(860) 355-0246 **TRAN THUY**

Neighborhood Profile (2000 Census)

Average Age: **39** Median Household Income: **\$38,167** Median Home Value: **\$163,000** Average Years of Education: **12**

PO BOX 665, NEW MILFORD CT 06776-0665, LITCHFIELD COUNTY (May 1997 - Sep 2007)

Neighborhood Profile (2000 Census)

Average Age: **36** Median Household Income: **\$52,317** Median Home Value: **\$151,400** Average Years of Education: **13**

PO BOX 2163, NEW MILFORD CT 06776-8163, LITCHFIELD COUNTY (Apr 2001)

Neighborhood Profile (2000 Census)

Average Age: **36** Median Household Income: **\$52,317** Median Home Value: **\$151,400** Average Years of Education: **13**

25 WELLSVILLE AVE, NEW MILFORD CT 06776-2720, LITCHFIELD COUNTY (Sep 1995)

Phone at address: **(860) 354-9071** **DEGOUT DAPHNE**

Neighborhood Profile (2000 Census)

Average Age: **36** Median Household Income: **\$52,317** Median Home Value: **\$151,400** Average Years of Education: **13**

Others Associated With Subjects SSN:

(DOES NOT usually indicate any type of fraud or deception)

RAJ MOHAMMED Age:

126-76-xxxx issued in New York between 01/01/1990 and 12/31/1991

Comprehensive Report Summary:

Bankruptcies:
None Found
Liens and Judgments:
1 Found
UCC Filings:
None Found
People at Work:
6 Found
Driver's License:
None Found
Address(es) Found:
0 Verified and 4 Non-Verified Found
Possible Properties Owned:
None Found
Motor Vehicles Registered:
2 Found
Watercraft:
None Found
FAA Certifications:
None Found
FAA Aircrafts:
None Found
Possible Criminal Records:
None Found
Sexual Offenses:
None Found
Florida Accidents:
None Found
Professional Licenses:
None Found
Voter Registration:
None Found
Hunting/Fishing Permit:
None Found
Concealed Weapons Permit:
None Found
Possible Associates:
1 Found
Possible Relatives:
1st Degree - 2 Found
2nd Degree - None Found
3rd Degree - None Found

Bankruptcies:

[None Found]

Liens and Judgments:

Type: JUDGMENT
Court:
Case Number:
Amount: \$340
Date Filed: 09/16/1999
Debtor Name:
Debtor SSN: 126-76-xxxx
Debtor Address: 125 RAILROAD ST, NEW MILFORD CT 06776-2717
Creditor: DANBURY HOSPITAL

UCC Filings:

[None Found]

People at Work:

Name: SIDDDQUE MOHAMMED
Title: MANAGER
SSN: 126-76-xxxx

Company: DOLLAR DAY DISCOUNT
Address:
Phone: (215) 424-5686
FEIN:
Dates: Sep, 2001
Confidence: High

Name: SIDDQUE MOHAMMED
Title: MANAGER
SSN: 126-76-xxxx
Company: DOLLAR DAY DISCOUNT
Address: 5627 N 5TH ST, PHILADELPHIA PA 19120-2305
Phone: (215) 424-5686
FEIN:
Dates: Sep, 2001
Confidence: High

Name: SIDDQUE MOHAMMED
Title: MANAGER
SSN: 126-76-xxxx
Company: DOLLAR DAY DISCOUNT
Address: 5627 N 5TH ST, PHILADELPHIA PA 19120-2305
Phone: (215) 424-5686
FEIN:
Dates: Sep, 2001
Confidence: High

Name: SIDDQUE MOHAMMED
SSN: 126-76-xxxx
Company: DOLLAR DAY DISCOUNT
Address: 5627 N 5TH ST, PHILADELPHIA PA 19120-2305
Phone: (215) 424-5686
FEIN:
Dates: Sep, 2001
Confidence: High

Name: MOHAMMED SIDDQUE
SSN: 126-76-xxxx
Company: M SIDDQUE PAINTING
Address: 125 RAILROAD ST STE 2, NEW MILFORD CT 06776-2717
Phone: (860) 350-3479
FEIN:
Dates: Apr 17, 2001 - Jul 01, 2001
Confidence: High

Name: MOHAMMED A SIDDQUE
Title: TECH
SSN: 126-76-xxxx
Company: HALY INC
Address:
Phone:
FEIN:
Dates: Jul 01, 2000 - Jun 01, 2001
Confidence: Medium

Driver's License Information:

[None Found]

Address Summary:

125 RAILROAD ST APT 2, NEW MILFORD CT 06776-2717, LITCHFIELD COUNTY (Sep 1995 - Nov 2007)
PO BOX 665, NEW MILFORD CT 06776-0665, LITCHFIELD COUNTY (May 1997 - Sep 2007)
PO BOX 2163, NEW MILFORD CT 06776-8163, LITCHFIELD COUNTY (Apr 2001)
25 WELLSVILLE AVE, NEW MILFORD CT 06776-2720, LITCHFIELD COUNTY (Sep 1995)

Previous And Non-Verified Address(es):

MOHAMMED SIDDIQUE - 125 RAILROAD ST APT 2, NEW MILFORD CT 06776-2717, LITCHFIELD

COUNTY (Sep 1995 - Nov 2007)

Current phones listed at this address:

MOGUMDER ABDUL M (860) 354-0681

TRAN THUY (860) 355-0246

Neighborhood Profile (2000 Census)

Average Age: 39

Median Household Income: \$38,167

Median Owner Occupied Home Value: \$163,000

Average Years of Education: 12

**MOHAMMED SIDDIQUE - PO BOX 665, NEW MILFORD CT 06776-0665, LITCHFIELD COUNTY
(May 1997 - Sep 2007)**

Neighborhood Profile (2000 Census)

Average Age: 36

Median Household Income: \$52,317

Median Owner Occupied Home Value: \$151,400

Average Years of Education: 13

**MOHAMMED SIDDIQUE - PO BOX 2163, NEW MILFORD CT 06776-8163, LITCHFIELD COUNTY
(Apr 2001)**

Neighborhood Profile (2000 Census)

Average Age: 36

Median Household Income: \$52,317

Median Owner Occupied Home Value: \$151,400

Average Years of Education: 13

**SIDDIQUE MOHAMMED - 25 WELLSVILLE AVE, NEW MILFORD CT 06776-2720, LITCHFIELD COUNTY
(Sep 1995)**

DEGOUT DAPHNE (860) 354-9071

Property Ownership Information for this Address

Property:

Parcel Number - 000000 - 010349

Book - 000499

Page - 000025

Owner Name 1 - DEGOUT DAPHNE

Address - 25 WELLSVILLE AVE, NEW MILFORD CT 06776-2720, LITCHFIELD COUNTY

Owner's Address - 25 WELLSVILLE AVE, NEW MILFORD CT 06776-2720, LITCHFIELD

COUNTY

Land Usage - SFR

Total Value - \$161,350

Land Value - \$39,480

Improvement Value - \$121,870

Land Size - 8,982

Year Built - 1955

Exterior Walls - ALUMINUM SIDING

Roof Type - ASPHALT SHINGLE

Heating - FORCED HOT WATER

Sale Date - 07/26/1994

Sale Price - \$116,000

Data Source - A

Neighborhood Profile (2000 Census)

Average Age: 36

Median Household Income: \$52,317

Median Owner Occupied Home Value: \$151,400

Average Years of Education: 13

Possible Properties Owned by Subject:

[None Found]

Motor Vehicles Registered To Subject:

Vehicle:

Description: 1984 Oldsmobile Cutlass Ciera Brougham - Sedan 4 Door

VIN: 1G3AM19E9EG316072

State of Origin: Connecticut

Title Number: 022126658

Title Date: 12/20/1994

Engine Size: 181

Number of Cylinders: 6

Body: Sedan 4 Door
Record Type: Current
Owner(s)

Name: MOHAMMED, SIDDQUE DOB: 02/01/1958 Age: 49
SIDDQUE MOHAMMED SSN: 126-76-xxxx
Address: 25 WELLSVILLE AVE, NEW MILFORD CT 06776, LITCHFIELD COUNTY

Lien Holder
None

Vehicle:

Description: 1990 Toyota Camry LE 4WD - Sedan 4 Door
License Plate: 117PPJ
License Plate Type: Private
VIN: JT2SV22J7L0032159
State of Origin: Connecticut
Title Number: 025795277
Title Date: 09/06/2000
Engine Size: 122
Number of Cylinders: 4
Body: Sedan 4 Door
Record Type: Historical
Expiration Date: 10/26/2002
Owner(s)

Name: SIDDIQUE, MOHAMMED DOB: 02/01/1958 Age: 49
MOHAMMED SIDDIQUE SSN: 126-76-xxxx
Address: PO BOX 665, NEW MILFORD CT 06776, LITCHFIELD COUNTY

Registrant(s)

Name: SIDDIQUE, MOHAMMED DOB: 02/01/1958 Age: 49
MOHAMMED SIDDIQUE SSN: 126-76-xxxx
Address: PO BOX 665, NEW MILFORD CT 06776, LITCHFIELD COUNTY

Lien Holder
None

Watercraft:

[None Found]

FAA Certifications:

[None Found]

FAA Aircrafts:

[None Found]

Possible Criminal Records:

[None Found]

Sexual Offenses:

[None Found]

Florida Accidents:

[None Found]

Professional License(s):

[None Found]

Voter Registration:

[None Found]

Hunting/Fishing Permit:

(None Found)

Concealed Weapons Permit:

(None Found)

Possible Associates:

MOHAMMED ABU BAKAR SIDDIQUE DOB: 01/10/1974 Age: 33

Previous And Non-Verified Address(es):

§ PO BOX 2163, NEW MILFORD CT 06776-8163, LITCHFIELD COUNTY

§ 125 RAILROAD ST APT 2, NEW MILFORD CT 06776-2717, LITCHFIELD COUNTY

Possible Relative Summary:

> MOHAMMED A SIDDIQUE , Age 88

> A MOHAMMED SIDDIQUE , Age 33

>> MOHAMMED PARTNE SIDDIQUE - (AKA), Age 33

Possible Relatives:

MOHAMMED A SIDDIQUE DOB: 02/01/1919 Age: 88

126-76-xxxx issued in New York between 01/01/1990 and 12/31/1991

Previous And Non-Verified Address(es):

MOHAMMED A SIDDIQUE - § PO BOX 665, NEW MILFORD CT 06776-0665, LITCHFIELD COUNTY (Jul 1996 - May 2004)

MOHAMMED A SIDDIQUE - § 125 RAILROAD ST # 2, NEW MILFORD CT 06776-2717, LITCHFIELD COUNTY (Sep 1995)

A MOHAMMED SIDDIQUE DOB: 01/10/1974 Age: 33

Names Associated with Relative:

MOHAMMED PARTNE SIDDIQUE DOB: 01/10/1974 Age: 33

058-84-xxxx issued in New York between 02/09/1995 and 09/03/1996

Active Address(es):

MOHAMMED A SIDDIQUE - ✓ 44 CANDLEWOOD LAKE RD S UNIT NO1, NEW MILFORD CT 06776-4560, LITCHFIELD COUNTY (Mar 2006 - Sep 2007)

SIDDIQUE MOHAMMED (860) 210-1495

Previous And Non-Verified Address(es):

MOHAMMED A SIDDIQUE - 737 NW 12TH ST APT 3, MIAMI FL 33136-2365, MIAMI-DADE COUNTY (Jun 2007 - Nov 2007)

MOHAMMED ABU BAKAR SIDDIQUE - § PO BOX 2163, NEW MILFORD CT 06776-8163, LITCHFIELD COUNTY (Jan 2001 - Oct 2007)

MOHAMMED ABU BAKAR SIDDIQUE - 48 SUNNY VALLEY RD APT 9, NEW MILFORD CT 06776-3341, LITCHFIELD COUNTY (Feb 2002 - Mar 2007)

MOHAMMED PARTNE SIDDIQUE - 542 NW 8TH ST APT 10, MIAMI FL 33136-3264, MIAMI-DADE COUNTY (Jan 2006 - Nov 2006)

MOHAMMED N SIDDIQUE - 535 NW 7TH ST APT 10, MIAMI FL 33136-3261, MIAMI-DADE COUNTY (Jan 2006 - May 2006)

MOHAMMED A SIDDIQUE - 115 FORT HILL RD, NEW MILFORD CT 06776-3342, LITCHFIELD COUNTY (Dec 2000)

MOHAMMED SIDDIQUE - 125 RAILROAD ST # A2, NEW MILFORD CT 06776-2717, LITCHFIELD COUNTY (Jul 1997)

MOHAMMED ABU BAKAR SIDDIQUE - 44 CANDLEWOOD LAKE RD S APT 1, NEW MILFORD CT 06776-4560, LITCHFIELD COUNTY



Low mileage! This owner drove an estimated 12,045 miles per year, lower than industry average of 15,000 miles. These vehicles can be a better value.

07/02/2001	57	New York Motor Vehicle Dept. Round Top, NY	Title issued or updated First owner reported Registered as personal vehicle Loan or lien reported
05/27/2003	32,619	Service Plan Co. Pine Plains, NY	Service contract issued
05/27/2003		New York Motor Vehicle Dept. Pine Plains, NY	Registration issued or renewed Registered as personal vehicle Passed safety inspection
06/25/2004	39,405	Inspection Co. New York	Vehicle inspected
12/11/2004	43,177	New York Inspection Station	Passed safety inspection Passed emissions inspection View what was inspected
12/13/2004		New York Motor Vehicle Dept. Poughquag, NY	Registration updated when owner moved the vehicle to a new location
12/31/2004	43,422	Colonial Subaru Ford Danbury, CT 203-744-8383 www.colonialautomobile.com	Vehicle serviced Pre-delivery inspection completed Suspension system serviced
01/26/2005	43,449	Dealer Inventory Danbury, CT	Vehicle offered for sale
01/27/2005		Dealer Inventory	Vehicle offered for sale
02/02/2005	43,450	Colonial Subaru Ford Danbury, CT 203-744-8383 www.colonialautomobile.com	Vehicle sold

OWNER 2

Purchased: 2005
 Where: Connecticut
 Est. miles/year: ---
 Est. length owned: 3/31/05 - present
 (2 yrs. 9 mo.)

Date:	Mileage:	Source:	Comments:
03/31/2005		Connecticut Motor Vehicle Dept. New Milford, CT Title #028936500	Title issued or updated New owner reported Loan or lien reported



If you are buying this vehicle from a private seller, check to be sure any associated lien on the vehicle has been paid off.



The last record reported to CARFAX is from March 2005. While there haven't been any DMV-reported problems, check with the seller to see if they have any service and repair records before you buy.

DOYON INS AGCY
23 SEGAR ST
DANBURY, CT 06810



MOHAMMED SIDDIQUE
P O BOX 665
NEW MILFORD, CT 06776

Policy number: 47353995-4

Underwritten by:
Progressive Casualty Insurance Co
March 25, 2008
Policy Period: Oct 5, 2007 - Apr 5, 2008
Page 1 of 2

203-744-2886

DOYON INS AGCY
Contact your agent for personalized service.

progressiveagent.com

Online Service
Make payments, check billing activity, update
policy information or check status of a claim.

800-274-4499

To report a claim.

Auto Insurance Coverage Summary

This is your Declarations Page

Your coverage has changed

Your coverage began on October 5, 2007 at 12:01 a.m. This policy expires on April 5, 2008 at 12:01 a.m.

This coverage summary replaces your prior one. Your insurance policy and any policy endorsements contain a full explanation of your coverage. The policy contract is form 9608 CT (01/02). The contract is modified by forms 0101 (08/02), 4884 CT (07/03), 6255 CT (05/05), Z538 (05/07) and 7951 CT (09/02).

Policy changes effective March 24, 2008

Changes requested on:	Mar 24, 2008 02:29 p.m.
Requested by:	FCD FROM DOYON INS AGCY
Premium change:	\$73.00
Changes:	The 2001 Toyota Tundra/Sr5 4C has been added. The 2001 Toyota Tundra PK has been removed.

Drivers and household residents

MOHAMMED SIDDIQUE

Additional information

Named insured

Outline of coverage

2001 Toyota Tundra/Sr5 4C

VIN 5TB8T441415127013

	Limits	Deductible	Premium
Liability To Others			\$582
Bodily Injury Liability	\$20,000 each person/\$40,000 each accident		
Property Damage Liability	\$25,000 each accident		
Uninsured/Underinsured Motorist - Nonstacked	\$20,000 each person/\$40,000 each accident		44
Comprehensive	Actual Cash Value	\$500	56
Collision	Actual Cash Value	\$500	446
Rental Reimbursement	\$30 each day/maximum 30 days		23
Roadside Assistance			6
Total 6 month policy premium			\$1,157

Premium discounts

Policy

47353995-4

5 year accident free and 3 year accident and violation free